

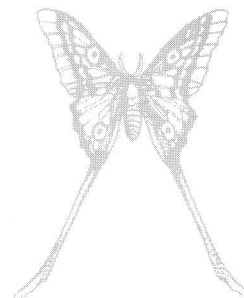
WILLERT HOME PRODUCTS

REC'D

JUN 07 1998

RESP

Date: 29 May 1998
Cynthia L. Hutchison, Environmental Engineer
RCRA Enforcement and State Programs Branch
U.S. Environmental Protection Agency
726 Minnesota Avenue
Kansas City, Kansas, 66101



Dear Ms. Hutchison,

In response to the letter from the U.S.E.P.A. dated May 14, 1998, **Request for Information.**

(Ref. Willert Home Products E.P.A. Inspection of October 28th & 29th 1997)

I deeply apologize for the "time lapse" since my last abatement letter to your organization and the receipt of your "Request for Information" letter.

Listed below you will find our Abatements to the **Information Requested:**

- Item 1. Describe the process identified in your December 3, 1997, letter as "steam filtering of spent activated charcoal. (See Exhibit A)**
- Item 2. Identify dates of steam filtering and quantities of material steamed. (See Exhibit B)**
- Item 3. Provide a copy of any and all test results from all sampling conducted on the charcoal filter media before steam filtering and the charcoal filter media and the steam water after steam filtering. (See Exhibits C-1 and C-2)**
- Item 4. Describe what was done with the charcoal filter media and the steam water from the steam filtering waste treatment process. (See Exhibit D)**
- Item 5. Provide documentation, in the form of manifests or other shipping documents where applicable, for all offsite shipments of charcoal filter media and steam water from the steam filtering waste treatment process. (See Exhibit E)**

Again, I apologize for the delay. If you have any questions, please feel free to contact me at anytime, at (314)772-2822 ext.338.



00180504

RCRA RECORDS CENTER

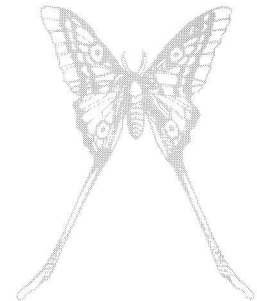
Sincerely,

For Smith
Safety Director

JUN 01 1998

RESP

EXHIBIT A



The sample (for Lab Analysis) steam filtering process of the activated charcoal consisted of the drilling of an 1" air vent hole/ steam condensation relief opening into the bottom of 55 gallon D.O.T. open top metal drum. An adapter for a steam hose connection was welded to the top of the metal lid for this drum. A "Star-type" manifold was affixed to the underside of the drum lid to assure complete steam absorption through-out the activated charcoal. A metal catch-pan was placed under the raised drum to catch the steam/water condensation. The steam filtering process was run approximately four (4) hours on this drum. This process produced approximately 2 gallons of condensation steam/water which was, (after cooling), placed back into our Charcoal Filter air purification tanks on the 3rd floor of para production. This "trial run" was conducted on November 20 1997. After drum was permitted to cool, a "grab sample" was withdrawn near the middle section of the drum and was submitted to Bodycote Laboratory for testing on November 21, 1997.

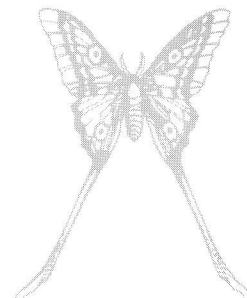
WILLERT HOME
PRODUCTS

REC'D

JUN 01 1998

RESP

EXHIBIT B



On the date of November 20, 1997 we steam filtered one (1) drum of activated charcoal.

The net drum weight was 250 lbs.

REC'D

JUN 01 1998

RESP

Bodycote

MATERIALS TESTING ♦ ST. LOUIS LABORATORY

METAL TECHNOLOGY

BODYCOTE INDUSTRIAL TESTING LTD. • 2350 SOUTH 7TH STREET, ST. LOUIS, MISSOURI 63104-4296 • TEL (314) 771-7111 • FAX (314) 771-9573

Report No. 97-10-05129

November 6, 1997

Examination of one (1) Activated Charcoal sample submitted 10/30/97.

Willert Home Products
4044 Park Avenue
St. Louis, MO 63110P.O.: 329675
Attn: Mr. Jim SmithTEST REPORT

Sample Identification:

Activated Charcoal
w/p-Dichlorobenzene
(BRTL #290646)

EXHIBIT C-1

TestResult
(mg/L)

p-Dichlorobenzene

9.4

(TEST RESULTS PRIOR TO SAMPLE BEING STEAM FILTER)

Symbol "mg/L" denotes milligrams per Liter or parts per million (ppm).

Test Method: SW 846 8260

Method Reference: Test Methods for Evaluating Solid Waste, 3rd. Edition,
USEPA, January 1995.

Results pertain to only those items submitted for testing.

Respectfully Submitted,

INDUSTRIAL TESTING LABORATORIES, INC.

By:

William A. Rorie
Vice PresidentFaxed: 11/5/97
LB - 74943
MP/MRH/kg

Inv. #12422

EXHIBIT C-2

JIM SMITH
Willert Home Products
4044 Park Avenue
St. Louis, Mo. 63110

REC'D
JUN 01 1998
RESP

21 November 1997

Joann Heiman (RPCB)
U.S.E.P.A.
726 Minnesota Avenue
Kansas City, Kansas 66101
ATTENTION:ARTD

Dear Mrs. Heiman,

This is a follow-up report, in response to the U.S.E.P.A. random inspection of the Willert Home Products' facility on the dates of 28 October and 29 October 1997.

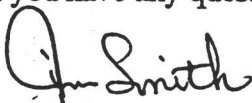
1.) 10CSR25-5.262(1)

40CFR 262.11

Make a waste determination on the spent activated charcoal.

ABATEMENT: We have steam cleaned/filtered a portion of this waste stream. I have sent a sample of this waste stream to Industrial Testing Labs. to have another TCLP performed. (See attached P.O.). I will send you the results upon receipt.

If you have any questions, please feel free to call me at anytime at 1-314-772-2822.



Jim Smith
Safety Director

cc: Sue Hantak
Jim Nehrt
Joe Adamo
Phil Wells

FAX (314) 772-3238

SUPPLIER

PURCHASE ORDER NUMBER

~~0000000000~~ 329882

PERSON REQUESTING:

PERSON
Jim Smith

INDUSTRIAL TESTING LABS.

DATE 11 / 20 / 97.

| DATE NEEDED — A.M. OR P.M.? | | SHIP VIA (DELIVERY SERVICE, UPS, ?) | |
|-----------------------------|--|---|--|
| QUANTITY | | PART NO. | |
| DESCRIPTION | | PRICE | |
| U/M | | | |
| ASAP. | | N/A | |
| / EA. SAMPLE | | TCLP REQUESTED ON SAMPLE OF ACTIVATED CHARCOAL WITH PARA-DICHLOROBENZENE | |
| | | \$150. ⁰⁰ - \$200. ⁰⁰ | |
| | | <div style="border: 1px solid black; border-radius: 50%; padding: 10px; display: inline-block;"> ATTN: Jim Smart. </div> <div style="border: 1px solid black; border-radius: 50%; padding: 10px; display: inline-block; margin-left: 20px;"> PHONE CONF. </div> | |
| SPECIAL NOTE: | | SAMPLE HAS BEEN "STEAM CLEANED" PRIOR TO TCLP TESTING. | |

| CODES | TO BE USED FOR | SIGNATURES |
|----------------------|---|-----------------------------------|
| PROJECT # <u>000</u> | OTHER <u>EPA REQUEST.</u> | SIGNED BY: <u><i>A. Smith</i></u> |
| COST CENTER: _____ | EQUIPMENT #: _____ | APPROVED: _____ |
| G.L.# _____ | TAXABLE? <input type="checkbox"/> YES <input type="checkbox"/> NO | _____ |

WILLERT HOME PRODUCTS

03 December 1997

Joann Heiman (RPCB)
U.S.E.P.A.
726 Minnesota Avenue
Kansas City, Kansas 66101
ATTENTION: ARTD

Dear Mrs. Heiman,

This is a follow-up report, in response to the U.S.E.P.A. random inspection of the Willert Home Products' facility on the dates of 28 October and 29 October 1997.

1.) 10CSR25-5.262(1)

40CFR 262.11

Make a waste determination on the spent activated charcoal.

ABATEMENT: We have steam cleaned/filtered a portion of this waste stream. I have sent a sample of this waste stream to Bodycote Testing Labs. to have another TCLP performed. I will send you the results upon receipt.

RESULTS: I have received the results from the Lab on 03 December 1997. As you can see, after steam-cleaning of the spent waste the p-Dichlorobenzene content has dropped to 0.51 mg/L with the Regulatory limits set at 7.5 mg/L. All of these drums will be steam filtered and disposed of in accordance with State and Local laws by February 1, 1998.

If you have any questions, please feel free to call me at anytime at 1-314-772-2822.



Jim Smith
Safety Director

cc: Sue Hantak
Jim Nehrt
Joe Adamo
Phil Wells



MATERIALS TESTING ♦ ST. LOUIS LABORATORY

METAL TECHNOLOGY

BODYCOTE INDUSTRIAL TESTING LTD. • 2350 SOUTH 7TH STREET, ST. LOUIS, MISSOURI 63104-4296 • TEL (314) 771-7111 • FAX (314) 771-9573

Report No. 97-11-05580

November 26, 1997

Examination of one (1) Granular Activated Charcoal sample submitted 11/21/97.

Willert Home Products
4044 Park Avenue
St. Louis, MO 63110P.O.: 329882
Attn: Mr. Jim SmithTEST REPORTSample Identification: Granular Activated Charcoal
After Steaming
(Blk No. 292424)

| <u>Test</u> | <u>Result</u> (mg/L) |
|-------------------|-------------------------|
| TCLP: | |
| p-Dichlorobenzene | 0.51 |

Symbol "mg/L" denotes milligrams per Liter or parts per million (ppm).

Test Method: SW-846 8260

Method Reference: Test Methods for Evaluating Solid Waste, 3rd. Edition,
USEPA, January 1995.

Results pertain to only those items submitted for testing.

Respectfully Submitted,

BODYCOTE INDUSTRIAL TESTING LTD.

By:

William A. Rorie
Vice President

LB - 74984

MRH/MP/ps/kg

DEC-02-1997 10:55

3147719573

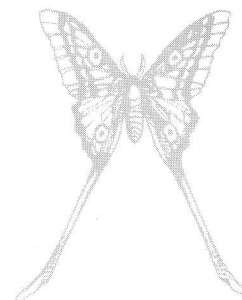
Inv. #12850

P.02

JUN 01 1998

RESP

EXHIBIT D



For description of disposal to charcoal and steam water see EXHIBIT A.

NOTE: This was the only drum that was steam filtered. Upon evaluation of this process, it was determined that it would not be cost effective and we could not meet the February 1, 1998 steam filtering and disposal date previously projected.

Based on steam filtering one drum per day (55 drums total):

December 1997.....12 drums

January 1998.....20 drums

32 drums total by February 1, 1998

(COST ANALYSIS)

Laboratory TCLP analysis per steam filtered drum...\$175.00 x 54= \$9,450.00

Labor hrs. steam filter and recycle charcoal & water. \$50.00 x 54= \$2,700.00

Disposal cost to Special waste landfill.....\$4000.00 roll-off container

Labor to fill roll-off container.....\$100.00

\$16,250.00 TOTAL

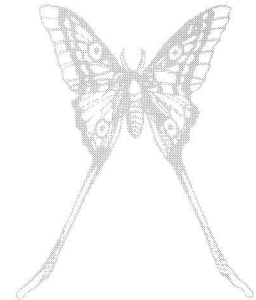
(vs)

\$13,000.00 to have disposed of as a Hazardous Waste

JUN 01 1998

RESP

EXHIBIT E



After cost analysis was reviewed, the decision was made to have Charcoal waste disposed of as a Hazardous Waste.(See attached Manifest)

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY
Hazardous Waste Program
P.O. Box 176 Jefferson City, Missouri 65102
573-751-3176

HAZARDOUS WASTE MANIFEST

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.
INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE ON A SEPARATE SHEET.

| | | | |
|-----------------------|------------------------------------|-----------------------------|---|
| EMERGENCY RESPONSE | U.S. COAST GUARD 1-800-424-8802 | CHEM TREC 1-800-424-9300 | DEPT. OF NATURAL RESOURCES 573-634-2436 |
|-----------------------|------------------------------------|-----------------------------|---|

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2050-0039. Expires 9-30-99

| | | | | | | | | | | | | | |
|---|--|--|--|---|--|--------------------------------------|--|---|--|----------------------------|--|-------------------------|--|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator's US EPA ID No. MO0006280089 | | Manifest Number No. 00021 | | 2. Page 1 of 1 | | Information in the shaded areas is required by State law. | | | | | |
| 3. Generator's Name and Mailing Address Wild Horse Products 2429 4044 Park Ave St Louis MO 63110 | | | | A. Missouri Manifest Document Number 004268 0021 | | | | | | | | | |
| 4. Generator's Phone (314) 772-2622 | | | | B. G.S.I. (Gen. Site Address) 111832 | | | | | | | | | |
| 5. Transporter 1 Company Name Able Transportation Inc | | | | 6. US EPA ID Number MO1985317444 | | C. MO. Trans. ID (800) 776-1330 | | | | | | | |
| 7. Transporter 2 Company Name | | | | 8. US EPA ID Number | | D. Transporter's Phone | | | | | | | |
| 9. Designated Facility Name and Site Address ERD-MO INC 3100 Industrial Fuel Drive Scott City MO 63780 | | | | 10. US EPA ID Number MO1985317444 | | E. MO. Trans. ID | | | | | | | |
| | | | | | | F. Transporter's Phone | | | | | | | |
| | | | | | | G. State Facility's ID 003279 | | | | | | | |
| | | | | | | H. Facility's Phone (973) 851-3444 | | | | | | | |
| 11. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group (if any)) | | | | | | 12. Containers Number Type | | 13. Total Quantity | | 14. Unit Wt/Vol. | | I. Waste No. | |
| a. Hazardous Waste, Solids, n.o.s. (p-Dichlorobenzene) # NA3077 PGIII RC(D027) | | | | | | 050 DM | | 275 DG | | | | EPA WASTE CODE STATE | |
| b. | | | | | | | | | | | | EPA WASTE CODE STATE | |
| c. | | | | | | | | | | | | EPA WASTE CODE STATE | |
| d. | | | | | | | | | | | | EPA WASTE CODE STATE | |
| J. Additional Descriptions for Materials Listed Above | | | | | | K. HANDLING CODE (FACILITY USE ONLY) | | | | | | | |
| a. 50-10 | | | | | | a. INTERIM | | FINAL | | 05103-01 COMMENTS | | | |
| b. | | | | | | b. | | | | | | | |
| c. | | | | | | c. | | | | | | | |
| d. | | | | | | d. | | | | | | | |
| 15. Special Handling Instructions and Additional Information | | | | | | | | | | | | | |
| Emergency Response #314-508-2600 Haz-Waste, Inc. ERG # 171 | | | | | | | | | | | | | |
| Trader License # MO970-788 State: MO | | | | | | | | | | | | | |
| 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford. | | | | | | | | | | | | | |
| Printed/Typed Name Jim Smith | | | | | | Signature Jim Smith | | | | Month Day Year 05 12 98 | | | |
| 17. Transporter 1 Acknowledgement of Receipt of Materials | | | | | | | | | | | | | |
| Printed/Typed Name Rick Tidwell | | | | | | Signature Rick Tidwell | | | | Month Day Year 05 12 98 | | | |
| 18. Transporter 2 Acknowledgement of Receipt of Materials | | | | | | | | | | | | | |
| Printed/Typed Name | | | | | | Signature | | | | Month Day Year | | | |
| 19. Discrepancy Indication Space | | | | | | | | | | | | | |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. | | | | | | | | | | | | | |
| Printed/Typed Name | | | | | | Signature | | | | Month Day Year | | | |

GENERATOR

TRANSPORTER

FACILITY

GENERATOR COPY - PART 6

IMPORTANT

SEE INSTRUCTIONS SHOULD PART 1 & 2 FAIL TO RETURN



5/28/98
Date

ERD-MO, INC. (LDR Continued)

F.

Treatment Standards for F001-F005 Spent Solvents Disclosure Form

Underlying constituents for F001-F005. The waste material referenced in page 2 section B meets the treatment standards for the hazardous constituents marked below.

Profile Number: CS103-01

| Hazardous Waste No. | Constituents of Concern | Non waste water | | Wastewater Total Composition mg/L |
|---------------------|--|-------------------------|-----------|-----------------------------------|
| | | Total Composition mg/kg | TCLP mg/L | |
| F001- | <input type="checkbox"/> Carbon tetrachloride | 5.6 | - | 0.06 |
| | <input type="checkbox"/> Methylene Chloride | 33 | - | 0.09 |
| | <input type="checkbox"/> Tetrachloroethylene | 5.6 | - | 0.06 |
| | <input type="checkbox"/> 1,1,1-Trichloroethane | 5.6 | - | 0.05 |
| | <input type="checkbox"/> Trichloroethylene | 5.6 | - | 0.05 |
| | <input type="checkbox"/> 1,1,2-Trichloro-1,2,2-trifluoroethane | 28 | - | 0.06 |
| | <input type="checkbox"/> Trichloromonofluoromethane | 33 | - | 0.02 |
| F002- | <input type="checkbox"/> Chlorobenzene | 5.7 | - | 0.06 |
| | <input type="checkbox"/> o-Dichlorobenzene | 6.2 | - | 0.09 |
| | <input type="checkbox"/> Methylene chloride | 33 | - | 0.09 |
| | <input type="checkbox"/> Methylene chloride (Pharmaceutical Industry - Wastewater Subcategory) | - | - | 0.44 |
| | <input type="checkbox"/> Tetrachloroethylene | 5.6 | - | 0.06 |
| | <input type="checkbox"/> 1,1,1-Trichloroethane | 5.6 | - | 0.05 |
| | <input type="checkbox"/> 1,1,2-Trichloroethane | 7.6 | - | 0.03 |
| | <input type="checkbox"/> Trichloroethylene | 5.6 | - | 0.05 |
| | <input type="checkbox"/> 1,1,2-Trichloro-1,2,2-trifluoroethane | 28 | - | 0.06 |
| | <input type="checkbox"/> Trichloromonofluoromethane | 33 | - | 0.02 |
| F003- | <input type="checkbox"/> Acetone | 160 | - | 0.28 |
| | <input type="checkbox"/> n-Butyl alcohol | 2.6 | - | 5.60 |
| | <input type="checkbox"/> Cyclohexanone * | | 0.75 | 0.36* |
| | <input type="checkbox"/> Ethyl acetate | 33 | - | 0.34 |
| | <input type="checkbox"/> Ethyl benzene | 6 | - | 0.06 |
| | <input type="checkbox"/> Ethyl ether | 160 | - | 0.12 |
| | <input type="checkbox"/> Methanol * | | 0.75 | 5.60* |
| | <input type="checkbox"/> Methyl isobutyl keytone | 33 | - | 0.14 |
| | <input type="checkbox"/> Xylenes (total) | 28 | - | 0.32 |
| | <input type="checkbox"/> Cresol (m- and p- isomers) | 3.2 | - | 0.77 |
| F004- | <input type="checkbox"/> o-Cresol | 5.6 | - | 0.11 |
| | <input type="checkbox"/> Nitrobenzene | 14 | - | 0.07 |
| F005- | <input type="checkbox"/> Benzene | 3.7 | - | 0.07 |
| | <input type="checkbox"/> Carbon disulfide * | | 4.8 | 0.014* |
| | <input type="checkbox"/> 2-Ethoxyethanol | INCIN | - | BIODG; or INCIN |
| | <input type="checkbox"/> Isobutyl alcohol | 170 | - | 5.60 |
| | <input type="checkbox"/> Methyl ethyl keytone | 36 | - | 0.28 |
| | <input type="checkbox"/> 2-Nitropropane | INCIN | - | (WETOX or CHOXD) |
| | <input type="checkbox"/> Pyridine | 16 | - | 0.01 |
| | <input type="checkbox"/> Toluene | 28 | - | 0.08 |

Note: F005 spent solvent wastes containing 2-Nitropropane and/or 2-Ethoxyethanol have treatment standards outlined in 40 CFR 268.40 and must be referenced in Table B page 2. (*) The treatment standards for Carbon Disulfide, Cyclohexanone, and Methanol nonwastewaters are based on the TCLP and apply only to spent solvents containing one, two, or all three of the constituents. If a waste contains an of these three constituents along with any other constituents found in F001-F005, then only the treatment standards for the other constituents apply (i.e., the standards for Carbon Disulfide, Cyclohexanone, and Methanol do not apply when other constituents are present).

G. Universal Treatment Standards Disclosure Form

☐ Check if none of the underlying hazardous constituents apply

Profile number: 05103-01

(*) Both Cyanides (Total) and Cyanides (Amenable) for nonwastewaters are to be analyzed using SW-846 Method 9010 or 9012 with a sample size of 10 grams and a distillation time of one hour and 15 minutes.

(**) The selection of D001 constituents is only required for low TOC ignitable liquids managed in non-CWA facilities.

ERD-MO, INC.
LAND DISPOSAL RESTRICTION (LDR) AND NOTIFICATION FORM

G.

Universal Treatment Standards Disclosure Form (cont'd)

Underlying constituents for D001** (low TOC, non-CWA), D002 (non-CWA), D012-D017 (nonwastewater), D018-D043 (non-CWA), and F039. The waste material referenced in Section B exceeds the treatment standards for the hazardous constituents marked below.

☒ Check if none of the underlying hazardous constituents apply

Profile number: _____

| Constituent | NWW | WW | Constituent | NWW | WW | Constituent | NWW | WW |
|--|------|-------|--|------|-------|---|-------|-------|
| <input type="checkbox"/> A22113 | 1.4 | 0.042 | <input type="checkbox"/> Diethylene glycol, dicarbamate | 1.4 | 0.056 | <input type="checkbox"/> Oxamyl | 0.028 | 0.056 |
| <input type="checkbox"/> Aldicarb sulfonic | 0.28 | 0.056 | <input type="checkbox"/> Dimeilan | 1.4 | 0.056 | <input type="checkbox"/> Pebulate | 1.4 | 0.042 |
| <input type="checkbox"/> Barban | 1.4 | 0.056 | <input type="checkbox"/> Dithiocarbamates (Total) | 28 | 0.028 | <input type="checkbox"/> o-Phenylenediamine | 5.6 | 0.056 |
| <input type="checkbox"/> Bendiocarb | 1.4 | 0.056 | <input type="checkbox"/> EPTC | 1.4 | 0.042 | <input type="checkbox"/> Physostigmine | 1.4 | 0.056 |
| <input type="checkbox"/> Bendiocarb phenol | 1.4 | 0.056 | <input type="checkbox"/> Formetanate hydrochloride | 1.4 | 0.056 | <input type="checkbox"/> Physostigmine salicylate | 1.4 | 0.056 |
| <input type="checkbox"/> Benomyl | 1.4 | 0.056 | <input type="checkbox"/> Formparanate | 1.4 | 0.056 | <input type="checkbox"/> Promecarb | 1.4 | 0.056 |
| <input type="checkbox"/> Butylate | 1.4 | 0.042 | <input type="checkbox"/> J-Iodo-2-propynyl n-butyl-carbamate | 1.4 | 0.056 | <input type="checkbox"/> Propham | 1.4 | 0.056 |
| <input type="checkbox"/> Carbaryl | 0.14 | 0.006 | <input type="checkbox"/> Isolan | 1.4 | 0.056 | <input type="checkbox"/> Propoxur | 1.4 | 0.056 |
| <input type="checkbox"/> Carbendazim | 1.4 | 0.056 | <input type="checkbox"/> Methiocarb | 1.4 | 0.056 | <input type="checkbox"/> Protulfocarb | 1.4 | 0.042 |
| <input type="checkbox"/> Carbofuran | 0.14 | 0.006 | <input type="checkbox"/> Methomyl | 0.14 | 0.028 | <input type="checkbox"/> Thiodicarb | 1.4 | 0.019 |
| <input type="checkbox"/> Carbofuran phenol | 1.4 | 0.056 | <input type="checkbox"/> Metolcarb | 1.4 | 0.056 | <input type="checkbox"/> Thiophanate-methyl | 1.4 | 0.056 |
| <input type="checkbox"/> Carbosulfan | 1.4 | 0.028 | <input type="checkbox"/> Mexacarb | 1.4 | 0.056 | <input type="checkbox"/> Tirpate | 0.28 | 0.056 |
| <input type="checkbox"/> m-Cumenyl methylcarbamate | 1.4 | 0.056 | <input type="checkbox"/> Molinate | 1.4 | 0.042 | <input type="checkbox"/> Triallate | 1.4 | 0.042 |
| <input type="checkbox"/> Cycloate | 1.4 | 0.042 | | | | <input type="checkbox"/> Trneuthylamine | 1.5 | 0.081 |
| | | | | | | <input type="checkbox"/> Vermolate | 1.4 | 0.042 |

(*) Both Cyanides (Total) and Cyanides (Amenable) for nonwastewaters are to be analyzed using SW-846 Method 9010 or 9012 with a sample size of 10 grams and a distillation time of one hour and 15 minutes.

(**) The selection of D001 constituents is only required for low TOC ignitable liquids managed in non-CWA facilities